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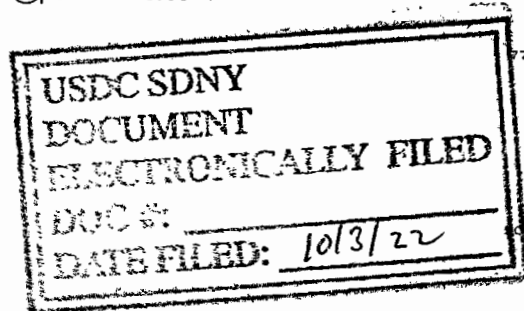
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September 29, 2022

**By ECF AND EMAIL**

The Honorable James L. Cott  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

*U.S. v. Victor Molina Rodriguez,*  
22 Mag. 4490

Dear Judge Cott:

We are CJA counsel to Mr. Victor Molina Rodriguez and write with the consent of Pretrial Services to request a modification of the conditions of Mr. Molina's bail. The government opposes this request.

Mr. Molina was arrested on May 19, 2022. He was released the next day, May 20, on conditions that included a personal recognizance bond of \$50,000 co-signed by three individuals approved by the government, travel restrictions of the Southern and Eastern Districts of New York and the District of New Jersey, surrender of his travel documents, and a curfew enforced by electronic monitoring. Having conferred with

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\*NOT ADMITTED TO THE NEW YORK BAR

Pretrial Services—and in light of the fact that Mr. Molina remains fully employed and has been out on bail without incident for over four months as the government decides whether or not to proceed with this case—we respectfully request that the curfew and electronic monitoring be removed as conditions of Mr. Molina's bail. The curfew limits Mr. Molina's work and family life, and the ankle bracelet subjects Mr. Molina to unnecessary stigma, jeopardizes his job security, and consumes resources best directed elsewhere.

We note in this respect that Mr. Molina has been out on bail without incident for over four months, and that he remains fully committed to abiding by the directions and requirements of Pretrial Services and this Court until the resolution of his case.

For these reasons—and again with the consent of Pretrial Services—we respectfully request that Mr. Molina's bail conditions be modified to remove the required curfew and condition of electronic monitoring.

Respectfully,

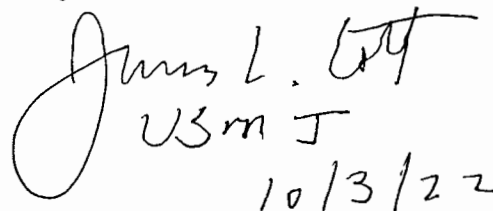


Roberto Finzi

cc: AUSA Jane Chong  
AUSA Matthew Shahabian  
Ms. Ashley L. Cosme, Pretrial Services

Having reviewed the parties' letters, and having consulted with PTS officer Cosme, who informed me that the defendant has been fully compliant with all conditions set and is a good candidate for removal of the electronic monitoring and curfew, the Court hereby grants the application. Mr. Molina's bail conditions are modified to remove the curfew and condition of electronic monitoring.

SO ORDERED.



USMJ  
10/3/22